

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	
-v.-	:	DECLARATION IN SUPPORT
	:	OF FINAL ORDER OF
ALEXANDER MASHINSKY,	:	<u>FORFEITURE</u>
	:	
	:	23 Cr. 347 (JGK)
	:	
Defendant.	:	
	:	
	:	
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Adam Hobson, pursuant to Title 28, United States Code, Section 1746, declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Jay Clayton, United States Attorney for the Southern District of New York, and attorney for the Government herein. I am responsible for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government's submission for the entry of a Final Order of Forfeiture in the above-captioned case.

2. On or about December 4, 2024, the Court entered a Consent Preliminary Order of Forfeiture as to Money Judgment/Specific Property (the "Preliminary Order of Forfeiture") (D.E. 109) with respect to ALEXANDER MASHINSKY (the "Defendant"), imposing a money judgment in the amount of \$48,393,446 in United States currency against the Defendant, and forfeiting to the United States all right, title and interest of the Defendant in the following specific property:

- a. Any and all funds in account number 055-72620-2 held at Goldman Sachs in the name of Koala1 LLC, and any and all monies, assets, and funds traceable thereto;

- b. Any and all funds in account number 056-30961-0 held at Goldman Sachs in the name of Koala1 LLC, and any and all monies, assets, and funds traceable thereto;
- c. Any and all funds in account number 055-72608-7 held at Goldman Sachs in the name of Koala2 LLC, and any and all monies, assets, and funds traceable thereto;
- d. Any and all funds in account number 055-72619-4 held at Goldman Sachs in the name of Koala3 LLC, and any and all monies, assets, and funds traceable thereto;
- e. Any and all funds in account number 857-07039 held at Merrill Lynch in the name of AM Ventures Holdings Inc., and any and all monies, assets, and funds traceable thereto;
- f. Any and all funds in account number 410005144897 held at SoFi Bank in the name of Alex Mashinsky, and any and all funds traceable thereto;
- g. Any and all funds an account number 4XU-08120-13 held at Sofi Securities in the name of Alex Mashinsky, and any and all monies, assets, and funds traceable thereto; and
- h. The real property located at 2004 East 8th Street, Austin, Texas, which is a residential home purchased by the defendant and Kristine Mashinsky on or about June 10, 2021, and more fully described as Lot Number 14, Block 21, of Grandview Place, a subdivision of Outlot No. 10 and parts of Outlots Nos. 8, 9, 11, and 62 in Division B, in Travis County, Texas, according to the plat recorded as Volume 3, Page 17, of the Plat Records of Travis County, Texas.
- i. Any and all funds in account number A9G-296437 held at First Republic Securities in the names of Alexander Mashinsky and Kristine Meehan, and any and all monies, assets, and funds traceable thereto (the “First Republic Account”)

(a. through i., collectively, the “Specific Properties”, a. through h., collectively, the “Subject Properties”).

3. The Notice of Forfeiture and the intent of the Government to dispose of the Specific Property was posted on an official government internet site (www.forfeiture.gov) beginning on January 11, 2025 for thirty (30) consecutive days, through February 9, 2025, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset

Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court on May 15, 2025 (D.E. 159).

4. On or about January 16, 2025, Notice of the Preliminary Order of Forfeiture was sent by certified mail, return receipt requested, to:

Kristine Meehan (Kristine Mashinsky)
New York, NY 10065

AM Ventures Holdings
New York, NY 10065

AM Ventures Holdings
New York, NY 10024

AM Ventures Holdings
Memphis, TN 38120

Cogency Global Inc.
Koala1, LLC
850 New Burton Road, Suite 201
Dover, DE 19904

Cogency Global Inc.
Koala2, LLC
850 New Burton Road, Suite 201
Dover, DE 19904

Cogency Global Inc.
Koala3, LLC
850 New Burton Road, Suite 201
Dover, DE 19904

AM Descendants Trust
4001 Kennett Pike
Greenville, DE 19807

Mashinsky Charitable Lead Annuity Trust
4001 Kennett Pike
Greenville, DE 19807

Ruth Gomez
Bronx, NY 10456

Chase Hernandez
Brooklyn, NY 11208

(collectively, the “Noticed Parties-1”);

WHEREAS, on or about February 20, 2025, notice of the Preliminary Order of Forfeiture was sent by certified mail, return receipt requested, to:

Dan Bukshpan
New York, NY 10024

Heidi Grevler
New York, NY 10025

(together, the “Noticed Parties-2”);

WHEREAS, on or about March 17, 2025, notice of the Preliminary Order of Forfeiture was sent by certified mail, return receipt requested, to:

Brendan Gilyan
Austin, TX 78735

(together with the Noticed Parties-1 and Noticed Parties-2, the “Noticed Parties”);

5. Since final publication of the Notice of Forfeiture, thirty (30) days have expired and no petitions or claims to contest the forfeiture of the Specific Properties have been filed.

6. The Defendant and the Noticed Parties are the only persons and/or entities known by the Government to have a potential interest in the Specific Properties.

7. The Preliminary Order of Forfeiture was entered forfeiting all of Defendant’s right, title and interest in any and all monies, assets, and funds on deposit in the First Republic Account.

8. The Government only seeks a final order of forfeiture as to fifty-percent (50%) of the funds, assets, and securities in the First Republic Account (together with the Subject Properties, the “Forfeitable Property”).

9. The Government disclaims any interest in the remaining fifty-percent of the funds, assets, and securities in the First Republic Account.

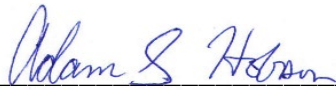
10. Accordingly, the Government requests that the Court enter the proposed Final Order of Forfeiture as to the Forfeitable Property.

11. No previous application for the relief requested herein has been sought.

Dated: New York, New York
May 15, 2025

JAY CLAYTON
United States Attorney for the
Southern District of New York

By:


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